

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**  
*Alexandria Division*

**KAREN YIANOPOULOS**

*Plaintiff,*

**v.**

**MIDDLE EAST BROADCASTING  
NETWORKS, INC.**

**Case No: 1:20-CV-1539-AJT/IDD**

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**PLAINTIFF COUNSEL'S CORRECTED PARTIAL CONSENT  
MOTION TO WITHDRAW AS COUNSEL**

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Barry Coburn, Katherine Zimmerl (*pro hac vice*), and the law firm of Coburn & Greenbaum, PLLC, respectfully submit this Motion to Withdraw as Counsel of Record for Plaintiff Karen Yianopoulos. Defendant Middle East Broadcasting Networks, Inc. consents to the relief sought in this motion. We do not, at this time, have consent from our client, Ms. Yianopoulos. A hearing on this Motion is requested on January 7, 2022. In support of this Motion, undersigned counsel respectfully submits the following:

1. On August 30, 2021, Ms. Yianopoulos filed her first amended complaint and demand for jury trial against Middle East Broadcasting Networks, Inc.
2. As the current schedule stands, fact discovery is set to close on February 25, 2022. The Final Pretrial Conference is set for March 17, 2022, at 10:00 am.
3. There has been an irrevocable breakdown of the attorney-client relationship between undersigned counsel and Ms. Yianopoulos, such that we are no longer able to function effectively as her counsel.

4. On December 26, 2021, Ms. Yianopoulos was notified of undersigned counsel's intent to move to withdraw as her counsel. A copy of this Motion will be served on Ms. Yianopoulos via e-mail and first-class mail.

Accordingly, it is respectfully submitted that an order should enter permitting counsel and the firm to withdraw as counsel of record for Ms. Yianopoulos, as well as any other relief the Court deems appropriate.

Dated: December 30, 2021

Respectfully submitted,

/s/ Barry Coburn

Barry Coburn  
VA Bar No. 036970

Katherine Zimmerl  
(admitted *pro hac vice*)

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*Counsel for Plaintiff Karen Yianopoulos*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of December, 2021 I caused a copy of the foregoing to be filed via this Court's electronic filing system, which will send notice to all counsel of record. I also will serve a copy upon Ms. Yianopoulos by e-mail and first-class mail.

/s/ Barry Coburn  
Barry Coburn